

May 8, 2002

NeuStar, Inc.	:	
in its role as North American	:	
Numbering Plan Administrator	:	
	:	00-0475
Petition for Approval of Numbering	:	
Plan Area Relief Planning for the 815	:	
Area Code	:	

TO ALL PARTIES OF INTEREST:

Copies of the attached letters are being served on all parties of record to this proceeding pursuant to 83 Ill. Adm. Code 200.710.

Sincerely,

Donna M. Caton
Chief Clerk

cp
Administrative Law Judges Moran & Sainsot

Matt C. Deering, Dennis K. Muncy
& Joseph D. Murphy
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mailto:hkelly@oalw.com

Donald E. Weig
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Sharon Telephone Company
105 Plain St.
Sharon, WI 53585-0400

Alvin Wilkening
General Manager
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114 Wall St.
PO Box 207
Alhambra, IL 62001

Service List 00-0475

Lloyd Vogel, President
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208 Allen St.
PO Box 158
Tonica, IL 61370

Jack D. Phillips
Citizens Communications
Frontier Communications
14450 Burnhaven Dr.
Burnsville, MN 55306

David R. Grahm
Wabash Telephone Cooperative, Inc.
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Louisville, IL 62858

James M. Grisham
Shawnee Telephone Company
PO Box 69
Equality, IL 62934

Michael Guffy
Madison Telephone Company
118 E. State St.
PO Box 158
Hamel, IL 62046

David E. Parkhill
Hamilton County Telephone Co-op
PO Box 40
Dahlgren, IL 62828

Douglas Dougherty, President
300 E. Monroe St., Ste. 306
PO Box 730
Springfield, IL 62705

April 8, 2002

Illinois Incumbent Local Exchange Carriers:

Forestalling the introduction of new area codes in the State of Illinois is a primary goal of the Illinois Commerce Commission ("Commission"). As you are keenly aware, new area codes impose significant burdens and costs and can lead to unpopular changes in dialing patterns. In an effort to forestall the need for new area codes, the Commission requests that all Incumbent Local Exchange Carriers make their rate centers Local Number Portability ("LNP") capable.

Due to technological limitations, historical patterns of use, and the arcane rules promulgated by federal regulators, vast inefficiencies exist in the utilization of telephone numbers. Indeed, the Commission has received proposals for area code relief plans in both the 815 and 618 areas *despite only a fraction of the telephone numbers being utilized in those area codes.*

Since 1995, the Commission has led the nation in its attempts to prolong the use of existing area codes. Illinois was the first state in the nation to implement thousand-block number pooling for wireline carriers. Thousand-block number pooling *coupled with the implementation of Local Number Portability*, has not only led to increased efficiency in the utilization of telephone numbers, but has benefited customers by allowing them to postpone the burdens imposed by new area codes. For instance, the Commission was successful in delaying the introduction of a new area code by over four years in the 847 area by requiring thousand-block number pooling

The Federal Communications Commission also recognized the benefits of number pooling and developed a number pooling rollout schedule. Unfortunately, the current FCC requirements mandate LNP only in the largest 100 Metropolitan Statistical Areas ("MSAs"). For the 815 and 618 area codes, this means that current FCC rules require LNP only within the Chicago and St. Louis MSAs, respectively. Notwithstanding these limitations on the national number-pooling rollout, SBC/Ameritech-Illinois and Verizon have voluntarily agreed to implement number pooling in all of their rate centers. It is this action that the Commission believes will likely result in postponing the burdens of a new area code for a long time.

To this end, the Commission requests you follow SBC/Ameritech Illinois' and Verizon's examples by voluntarily making your rate centers LNP-capable. Since number pooling is predicated on local number portability, LNP-capable rate centers would enable thousand-block number pooling to be employed throughout the entire 815 and 618 area codes. We are sure that you share the Commission's concerns regarding the burdens that inefficient utilization of telephone numbers imposes on your customers and hope that, with your cooperation, we can forestall the introduction of new area codes in Illinois.

Please provide a response to the Commission no later than April 26, 2002, indicating whether your company plans to participate in our number pooling initiative. Please include cost estimates for making your rate centers LNP-capable, as well as explanations as to how those cost estimates were derived. If you are unable or unwilling to make your rate centers LNP-capable, please explain your reasons for not participating.

We welcome any further ideas you may have as to how we can further extend the use of existing area codes. Thank you, in advance, for your cooperation.

Sincerely,

Richard L. Mathias
Chairman



Established in 1908

The Bergen Telephone Company

105 Plain Street
SHARON, WISCONSIN 53585-0400

Voice: 262/736-9981

Fax: 262/736-9200

RECEIVED

APR 30 REC'D

ILLINOIS COMMERCE COMMISSION
CHICAGO OFFICE

April 23, 2002

Mr. Richard L. Mathias, Chairman
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

Dear Mr. Mathias:

In response to your letter of April 9, 2002 concerning the adoption of LNP to allow number pooling, we have determined the following: The cost as determined by our switch vendor Nortel Networks is \$4.00 per line plus considerable translation and other upfront costs. Since our switch serves all of our customers, most of whom are in Wisconsin, we would have to pay for this feature for all of our lines even though only a very small number are in Illinois. To date we have never had a need for LNP anywhere. So far as we can determine this feature would be a considerable expense with no currently foreseeable usage. In the event that LNP would be useful in our system, we would then consider implementing this feature.

Very truly yours,

Donald E. Weig
Donald E. Weig
President



Established in 1900

SHARON TELEPHONE COMPANY

105 Plain Street
SHARON, WISCONSIN 53585-0400

Voice: 262/736-9981
Fax: 262/736-9200

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APR 30 REC'D

ILLINOIS COMMERCIAL COMMISSION
CHICAGO OFFICE

April 23, 2002

Mr. Richard L. Mathias, Chairman
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

Dear Mr. Mathias:

In response to your letter of April 9, 2002 concerning the adoption of LNP to allow number pooling, we have determined the following: The cost as determined by our switch vender Nortel Networks is \$4.00 per line plus considerable translation and other upfront costs. Since our switch serves all of our customers, most of whom are in Wisconsin, we would have to pay for this feature for all of our lines even though only a very small number are in Illinois. To date we have never had a need for LNP anywhere. So far as we can determine this feature would be a considerable expense with no currently foreseeable usage. In the event that LNP would be useful in our system, we would then consider implementing this feature.

Very truly yours,

Donald E. Weig
Donald E. Weig
President



**Alhambra-Grantfork
Telephone Company**

114 Wall Street
PO Box 207
Alhambra, IL 62001
618 488 2165

April 23, 2002

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APR 29 2002

TELECOMMUNICATIONS
DIVISION

Ms. Donna Canton
Chief Clerk
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, Illinois 62701

Dear Ms. Canton:

The letter is our response requested in the April 9, 2002 letter sent by Richard Mathias, Chairman, regarding Local Number Portability (LNP) in the 815 and 618 area codes. At this time, Alhambra-Grantfork Telephone Company is not LNP capable and will not be participating in the Commission's number pooling initiative.

Per the April 9, 2002 letter by Chairman Mathias, Alhambra-Grantfork was requested to list the reason why it is not participating in LNP at this point in time. Alhambra-Grantfork is a member of the Illinois Telephone Association (ITA) and concurs with the ITA's April 22, 2002 letter by Douglas Dougherty on LNP.

If you have any questions, please contact Jamie Becker with GVNW Consulting, Inc. at 217-698-2700.

Sincerely,

Alvin Wilkening
General Manager

Cc: Douglas Dougherty, Illinois Telephone Association
Jamie Becker, GVNW Consulting, Inc.

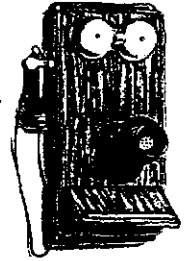
Tonica Telephone Company

"Serving Since 1900"

April 16, 2002

Illinois Commerce Commission
Chief Clerk's Office
527 East Capitol Avenue
Springfield, IL 62701

*208 Allen Street
P.O. Box 158
Tonica, Illinois 61370*



*Tel. 815-442-9901
Fax 815-442-9921*

Re: Tonica Telephone Company Participation in Number Pooling in 815 NPA
To Whom It May Concern:

This letter is being issued in response to the letter received from the Illinois Commerce Commission by Tonica Telephone Company dated April 9, 2002. In this letter from the Commission, the Commission requests a response as to the plans of the company for participation in the number pooling initiative for the 815 NPA.

At this time, the Tonica Telephone Company does not plan to participate in the number pooling initiative in the 815 NPA. Tonica Telephone Company is a small rural local exchange carrier serving the community of Tonica, Illinois and the surrounding area. The company has only one NXX code assigned to it for use in serving this territory. The NXX that the company has been assigned (the 815-442 NPA-NXX) will serve the needs of the company for the foreseeable future. The company is not placing extraordinary demands on the numbering resources of the 815 NPA. If allowed to keep our existing NXX number resources, the company should be covered for its needs well into the future.

Additionally, the company has researched the cost of LNP with its switching vendor. The cost of adding LNP capability to our central office will be approximately \$25,000.00. This additional investment in central office switching equipment does not make economic or business sense given the size of our customer base. Tonica Telephone Company serves approximately 560 access lines. Given the small size of our customer base and the disproportionately large investment to implement LNP, the cost outweighs the potential benefits to our customers.

Finally, Tonica Telephone Company has never received a request by any party for LNP service. Making a large investment in our central office switching equipment for a service that has never been requested from the company makes no sense.

For the reasons stated above, Tonica Telephone Company does not plan to participate in the number pooling initiative for the 815 NPA. If you have any questions, please contact me at 815-442-9901.

Sincerely,

Lloyd Vogel, President Tonica Telephone Company



April 26, 2002

Donna M. Caton
Chief Clerk
Illinois Commerce Commission
527 East Capitol Ave.
Springfield, IL 62701

RECEIVED

APR 29 2002

TELECOMMUNICATIONS
DIVISION

Re: Commission Request for Voluntary LNP

Dear Ms. Caton,

This letter is sent on behalf of Citizens Telecommunications Company ("Frontier Citizens"). It is in response to a letter sent by Chairman Mathias on April 9, 2002 requesting that incumbent local exchange carriers voluntarily make their rate centers LNP-capable in the 618 and 815 area codes.

Frontier Citizens is investigating the cost of making its rate centers in 618 and 815 LNP-capable with our respective vendors. Although we are still awaiting firm quotes, we have estimated the amount is approximately \$ 1.6 million. This estimate was obtained from personnel familiar with the cost of LNP and the types of central offices Frontier Citizens has in the 618 and 815 area codes.

Frontier Citizens shares the Illinois Commerce Commission's ("Commission") concerns regarding the burdens that inefficient utilization of telephone numbers imposes on various parties and hope that we can forestall the introduction of new area codes in Illinois. However, we cannot commit to spending that kind of money to make our rate centers LNP-capable without assurances from the Commission that we will be able to recover the costs via a surcharge to end users. There is concern that, under FCC rules, companies would only be allowed to do so upon receiving a Bona-Fide LNP Request. We are not sure if the Commission's request meets the criteria.

We are further studying whether or not thousand block pooling will be an effective approach to conserving numbers in our rural territory. If we have any new ideas about how to extend the use of existing area codes, we will share them.

Sincerely,

A handwritten signature in dark ink, appearing to read "J. Phillips".

Jack D. Phillips
Regulatory Director-Central Region

frontier®

RECEIVED
TELECOMMUNICATIONS
DIVISION
APR 29 2002

Frontier Communications

14450 Burnhaven Drive
Burnsville, MN 55306

April 26, 2002

TELECOMMUNICATIONS
DIVISION

Donna M. Caton
Chief Clerk
Illinois Commerce Commission
527 East Capitol Ave.
Springfield, IL 62701

Re: Commission Request for Voluntary LNP

Dear Ms. Caton,

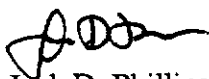
This letter is sent on behalf of Frontier Communications of DePue, Inc., Frontier Communications of Illinois, Inc., Frontier Communications—Midland, Inc., and Frontier Communications—Prairie, Inc. (collectively "Frontier"). It is in response to a letter sent by Chairman Mathias on April 9, 2002 requesting that incumbent local exchange carriers voluntarily make their rate centers LNP-capable in the 618 and 815 area codes.

Frontier is investigating the cost of making its rate centers in 618 and 815 LNP-capable with our respective vendors. Although we are still awaiting firm quotes, we have estimated the amount is approximately \$ 720,000 for switches serving 6,500 access lines. This estimate was obtained from personnel familiar with the cost of LNP and the types of central offices Frontier has in the 618 and 815 area codes

Frontier shares the Illinois Commerce Commission's ("Commission") concerns regarding the burdens that inefficient utilization of telephone numbers imposes on various parties and hope that we can forestall the introduction of new area codes in Illinois. However, we cannot commit to spending that kind of money to make our rate centers LNP-capable without assurances from the Commission that we will be able to recover the costs via a surcharge to end users. There is concern that, under FCC rules, companies would only be allowed to do so upon receiving a Bona-Fide LNP Request. We are not sure if the Commission's request meets the criteria.

We are further studying whether or not thousand block pooling will be an effective approach to conserving numbers in our rural territory. If we have any new ideas about how to extend the use of existing area codes, we will share them.

Sincerely,



Jack D. Phillips
Regulatory Director-Central Region



Wabash Telephone Cooperative Inc.

April 22, 2002

Mr. Richard L. Mathias, Chairman
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

ILLINOIS COMMERCE
COMMISSION
APR 23 2 17 PM '02
OFFICE OF
CHAIRMAN AND
COMMISSIONERS

Dear Mr. Mathias:

In answer to your request of April 9, 2002, regarding Local Number Portability capabilities and costs, I submit the following response.

The cost estimate to make all rate centers within the Wabash Telephone Cooperative, Inc. serving area LNP capable would be approximately \$36,000.00. This cost is derived from an LNP pricing sheet provided by Siemens Stromberg-Carlson.

As our name, Cooperative, portrays, we are always willing to work together for the common good of the majority. However, it appears the cost of this capability exceeds the benefit of the minimal codes that could be recovered from Wabash.

As usual, should this capability be mandated, Wabash would extend every effort to comply.

Sincerely,

David R. Grah
General Manager/EVP
Wabash Telephone Cooperative, Inc.

(618) 665-3311
FAX (618) 665-4188

P.O. Box 299
Louisville, IL 62858

GALLATIN RIVER COMMUNICATIONS

David O. Rudd
Director
State Government Relations

April 24, 2002

APR 26 REC'D

CLERK'S OFFICE

625 S. Second St., Suite 103-D
Springfield, IL 62704
Telephone: 217/744-2420
Fax: 217/744-2421

The Honorable Richard L. Mathias
Chairman, Illinois Commerce Commission
527 East Capitol Avenue
Springfield, Illinois 62701

Dear Chairman Mathias:

I am writing on behalf of Gallatin River Communications L.L.C. in response to your letter of April 9 regarding area code exhaustion and potential remedies. Gallatin shares the Commission's concerns regarding inefficient utilization of numbering resources.

However, Gallatin agrees with the position expressed by Doug Dougherty of the Illinois Telecommunications Association that LNP does not address the root cause of why the 618 and 815 area codes are in jeopardy of an exhaust. Unfettered virtual NXX usage and the questionable activities of certain carriers are responsible for the situation in the 618 and 815 area codes.

Since in Gallatin's view LNP does not adequately address these problems and would be extremely expensive to implement and offer few benefits to our customers, Gallatin does not feel it would be in the best interest of Gallatin or its customers to implement LNP at this time.

Gallatin appreciates this opportunity to respond to your concerns and looks forward to working with the Commission to find a solution to number resource issues. If you have any questions, please feel free to call me.

Sincerely,



David O. Rudd
Gallatin River Communications L.L.C.
(217) 744-2420 dorudd@aol.com



Shawnee Telephone Company

P.O. Box 69
P.O. Box 326

• Equality, IL 62934
• Rosiclare, IL 62982

• Phone (800) 461-3956
• Phone (888) 834-6511

April 25, 2002

Richard Mathias, Chairman
Illinois Commerce Commission
527 East Capital Avenue
Springfield, IL 62701

ILLINOIS COMMERCE
COMMISSION
OFFICE OF
CHAIRMAN AND
COMMISSIONERS
APR 25 12 20 PM '02

Dear Chairman Mathias,

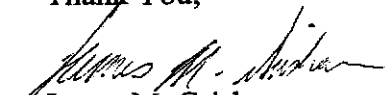
Shawnee Telephone Company is a small telephone company in the 618 area code. We would like to reference the letter from the Illinois Telecommunications Association (ITA) and hope that all of the potential remedies to the 618 area code problem have been exhausted.

If all remedies have been exhausted, Shawnee Telephone Company would consider implementing Local Number Portability and adding Number Pooling capabilities in our rate centers on a voluntary basis.

The cost for Local Number Portability (LNP) would be approximately \$70,000.00 for hardware and software plus installation charges. This estimated cost would be for our DCO host with five remotes and our Remote Node Switch (RNS) with two remotes.

Again, we would consider implementing this only if all other possibilities are exhausted.

Thank You,


James M. Grisham
Controller



April 25, 2002

118 EAST STATE STREET
P.O. BOX 158
HAMEL, ILLINOIS 62046
TELEPHONE 618-633-2267
FACSIMILE 618-633-2713
www.madisontelco.com

Mr. Richard Mathias, Chairman
Illinois Commerce Commission
527 E Capital Avenue
Springfield, IL 62701

RE: 618 Area Code Exhaust

Dear Chairman Mathias,

In response to your letter of April 9, 2002, I would first like to commend this Commission for conducting focus groups throughout the 618 area code. I believe these "town meetings" provided a wonderful opportunity for regulators, industry providers and the citizens of the area to meet and discuss this important issue. I share your concerns regarding the complexities of the inefficient utilization of a limited pool of telephone numbers. Nevertheless, the imposition of local number portability (LNP) on a certain subset of carriers is burdensome, expensive, and confusing to the citizens of these communities.

I would respectfully suggest, as I did in testimony in this proceeding (see Docket 00-0677, February 14, 2002 transcript pages 332 and 333), that the true solution to this problem is not to inconvenience the hundreds of thousands of citizens in the 618 area code, but to simply examine the cause of this "crisis" and address that cause. The jeopardy situation in 618 is a direct result of two (2) CLEC's with questionable business plans designed primarily around "gaming the system" at the expense of others. Therefore, I would suggest that this Commission revisit the issues surrounding virtual NXX and focus on an effort to aggressively reclaim the NXX codes inappropriately held by certain CLECs. If we fail to eliminate the root cause of this problem, we will fail to address the exhaust of numbering resources in the 618 NPA.

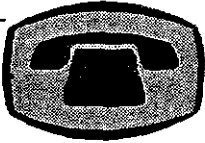
To conclude, Madison Telephone Company would incur significant cost to provided LNP and believes this strategy should only be implemented after all other possibilities have been exhausted. Please contact me directly with any questions or concerns at 618.633.2267.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Guffy', with a long, sweeping horizontal line extending to the right.

Michael Guffy : Director -
Financial & Regulatory Affairs

ILLINOIS COMMERCE
COMMISSION
APR 25 12 20 PM
OFFICE OF
CHAIRMAN AND
COMMISSIONERS



Hamilton County Telephone Co-op

P.O. Box 40 Dahlgren, IL 62828

Telephone 618/736-2211 Fax 618/736-2616

REC'D

April 23, 2002

APR 25 REC'D

ILLINOIS C. _____
CHICAGO OFFICE

Richard Mathias, Chairman
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, Illinois 62701

Dear Chairman Mathias

Hamilton County Telephone Co-op wishes to do its part in making efficient use of the NXX's in the 618 area. However, I believe this can be accomplished in a manner different to what you have outlined without the small local telephone exchanges having to make a rather large outlay of money to do this. I believe that Doug Daugherty of the ITA has outlined some of this in a previous letter to you.

The cost to Hamilton County Telephone Co-op to make the changes in our central office switch is approximately \$40,000.00. This is an estimate provided to me by Siemens, the manufacturer of our switch. In talking with our billing software vendor, Quintrex Data Systems, they estimate it will take approximately \$500,000.00 to rework the software to handle the billing of a call between one number in an NPA NXX and another number within the same NPA NXX that is with another company. This would then be spread among the companies that need this software revision. In Illinois there are two companies that use Quintrex and I do not know if any other companies they work with in other states are needing this type of change or not. Quintrex has also told me that it would be at least a year before they would have this worked out.

If this is the direction the Commission wishes us to take, I believe there should be some monetary help from someone.

Hamilton County Telephone Co-op will await your ruling on this matter before we proceed.

Sincerely

David E. Parkhill, EVP/GM



April 22, 2002

Richard Mathias, Chairman
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, Illinois 62701

Dear Chairman Mathias:

Several members of the Illinois Telecommunications Association (ITA) have forwarded me a copy of your letter of April 9, 2002, the contents of which were discussed by the ITA Board of Directors at its meeting on April 19, 2002. The Board has directed me to respond to your letter and to express the collective sentiment of the ITA membership operating in the 618 and 815 area codes with respect to area code exhaust and potential remedies. Each ITA member is free to respond individually to your letter of April 9, 2002.

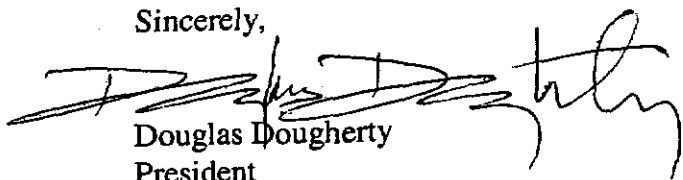
First, let me state that the ITA does indeed share the Illinois Commerce Commission's concern regarding the burdens that inefficient utilization of telephone numbers impose not only on our customers but also on telecommunications carriers as evidenced by the requests made in your April 9th letter. The imposition of local number portability on certain carriers is burdensome and expensive. I would also suggest that LNP does not address the root cause of why 618 and 815 area codes are in jeopardy of an exhaust. The "real" reason is the Illinois Commerce Commission's silence regarding virtual NXX usage and the questionable activities of certain companies operating in the 618 and 815 area code regions. When 29 percent of the numbers in a given area code are being utilized and the area code is in exhaust, something is amiss and porting numbers isn't going to fix it.

Several months ago I personally visited ICC staff to explain in detail the use of virtual NXX and how certain companies certificated by the ICC as facilities based Competitive Local Exchange Carriers (CLEC) were assigned blocks of numbers that were sitting idle. I encouraged the staff to implement an aggressive reclamation process to retrieve these numbers. In a follow up meeting, I further explained that, in addition to artificially inducing the exhaust of area codes, these companies were "gaming the system" and operating in a questionable manner. I subsequently submitted the attached white paper on NXX usage to the ICC staff. It now appears that my reclamation recommendation and the concerns I expressed have fallen on deaf ears. Not only have the issues and concerns raised by the ITA not been addressed, the ICC is now apparently shifting, unrealistically, the hope of forestalling the exhaust of these areas codes to the members of the ITA.

I strongly encourage the ICC to revisit this issue of virtual NXX and focus on the root cause of why these area codes are running out of numbers and to pursue aggressively the reclamation of NXX codes inappropriately held by certain companies, as other states have done. To do otherwise will allow certain CLECs to exploit circumstances that mask the marketplace, promote questionable subsidies (free transport), and permit companies to use the telecommunications network in a manner inconsistent with existing regulatory parameters. If the ICC fails to act to remedy the root causes that are artificially exhausting the 618 and 815 area codes, the Illinois Telecommunications Association will be forced to seek relief for our members and our members' customers through all available means.

I look forward to your response.

Sincerely,

A handwritten signature in dark ink, appearing to read "Doug Dougherty", written over the printed name and title.

Douglas Dougherty
President

CC: Commissioner Harvill
Commissioner Hurley
Commissioner Kretschmer
Commissioner Squires
ITA Board of Directors

The Virtual NXX (a/k/a/ virtual FX) Provider's False Claim for Numbering Resources

A Case for NXX Reclamation and Area Code Preservation by the Illinois Commerce Commission

Certain Competitive Local Exchange Carriers (CLEC) have obtained numbering resources for rate centers in which they do not have facilities or customers. It is unlikely that these CLECs that deploy a virtual NXX scheme will ever use a fraction of the numbers assigned to them. The experience of larger ILECs is that the primary motivator for the CLEC to assign virtual NXX numbers is to take advantage of limitations in the billing systems of larger ILECs.

The billing systems of most large ILECs are designed on the premise that numbers are assigned to the geographic area for which they have been requested. The billing system compares the originating number and the called number to determine if traffic is local or toll. Virtual NXX numbers appear to be local to the billing system because the numbers are represented in the local exchange routing guide (LERG) as local to the customers initiating calls to virtual NXX numbers.

When calls are originated by ILEC customers to CLEC virtual NXX numbers in the same rate center as the ILEC customers initiating the calls, the ILEC switch routes the call to the CLEC switch, which is normally beyond the local calling area. Because the ILEC billing system compares numbers to determine if local or toll billing applies, the billing system views such calls as local traffic. As such, no toll billing record is generated for the vast majority of calls carried to the CLEC's switch which terminate outside of the ILEC's local calling area. This traffic is essentially transported over the ILEC's facilities for which the CLEC does not provide compensation and in certain cases the ILEC has to pay reciprocal compensation to that same CLEC.

The Illinois Commerce Commission should subject Virtual NXX providers operating under the banner of a Competitive Local Exchange Carrier and in possession of numbering resources to a rigorous accounting of number utilization. Where appropriate, the ICC should reclaim these numbering resources.



STATE OF ILLINOIS

Office of the Chairman and Commissioners

Illinois Commerce Commission

May 2, 2002

Mr. Doug Dougherty
Illinois Telephone Association
300 E. Monroe, Suite 300
P.O. Box 730
Springfield, Illinois 62705

Re: Your April 22, 2002 Letter

Dear Mr. Dougherty:

First, let me express my disappointment over the tone of your letter of April 22, 2002. The last paragraph in particular is very disturbing and totally out of character with the type of response your association usually provides. I wish you would have responded to the Commission's inquiry in a more constructive manner instead of simply dismissing Local Number Portability as "burdensome and expensive." The Commission is attempting to address an issue that is of great interest to Illinois citizens, many of whom are customers of your incumbent local exchange carrier member companies.

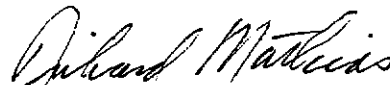
Second, by trying to impose your view of a perceived single "root cause" for area code exhaustion upon the Commission, are you effectively taking a narrow-minded perspective that you are accusing the Commission of taking? While I do not want to speculate over your statements regarding "questionable activities by certain carriers" that are "gaming the system", I want to remind you that some of the "new" carriers have no choice but to take a complete NXX code of 10,000 telephone numbers just to receive the few telephone numbers they need to conduct business in any given rate center. The reason they have to take a full set of 10,000 numbers is because many incumbent local exchange carriers in the 618 and 815 areas do not have number pooling capabilities at this time. Without addressing the merits of the "virtual NXX" issue, it is apparent that many of the new carriers willingly would have taken only one tenth of the numbering resources if all incumbent local exchange carriers in the 618 and 815 areas had number pooling capabilities.

Mr. Doug Dougherty
May 2, 2002
Page 2

Third, your letter is silent about the fact that there are roughly 2 million unused numbers held by incumbent local exchange carriers in the 618 and 815 areas that cannot be used by any other carrier because, again, incumbent local exchange carriers do not have number pooling capabilities. For example, if a carrier wants to receive a small set of numbers in a rate center where only a few hundred of the 10,000 numbers in the NXX are being used by the incumbent, the new entrant has to order a entirely new NXX code. Thus, your recommended "aggressive reclamation process", targeted solely to the new entrants, seems highly inappropriate and self-serving. Nonetheless - and contrary to your assertions - it is my understanding that Commission Staff is actively working with some of the "questionable" carriers to find ways to further help extend the life of the 618 and 815 area codes.

Finally, the issue of providing "virtual NXX" codes and the resulting carrier compensation mechanisms are very complex and do not lend themselves to a simple characterization of "questionable subsidies." I am confident that the treatment of "virtual NXX" traffic in the context of inter-carrier compensation will come before the Commission, with all parties having an opportunity to express their view.

Sincerely,



Richard L. Mathias

cc: Commissioner Terry S. Harvill
Commissioner Edward C. Hurley
Commissioner Ruth K. Kretschmer
Commissioner Mary Frances Squires
Executive Director Scott Wiseman
Filed in Dockets 00-0677 and 00-0475